

**Carol P. Kuhnnow**  
Regional Director, Policy & Law

4250 N. Fairfax Drive, 13th Floor  
Arlington, Virginia 22203

carol.kuhnnow@qwest.com  
703 363 3189

\*03 MAR 10

ride the light

AM 9 49

Qwest.

TN REGULATORY AUTHORITY  
DOCKET ROOM

**VIA FACSIMILE & OVERNIGHT DELIVERY**

March 6, 2003


Mr. Joe Werner, Chief  
Telecommunications Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**RE: Docket 02-00207, Petition of the Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element**

Dear Mr. Werner:

Qwest Communications Corporation hereby submits its response to your October 25, 2002 letter concerning the above reference docket.

Sincerely,



Carol P. Kuhnnow  
Regional Director  
Policy & Law

Enclosure

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

1. Identify each switch that you own or operate to provide local exchange service in the State of Tennessee, including, but not limited to, switches outside Tennessee. In answering this request, please describe with particularity for each switch:
  - (a) the specific location of the switch;
  - (b) the functions and capabilities of the switch;
  - (c) the geographic area served by the switch;
  - (d) the total number of access lines or equivalent lines the switch is capable of serving;
  - (e) the total number of access lines or equivalent lines the switch is currently serving;
  - (f) divide the total number of lines provided in the response to request (e) into the following three categories: Number of analog lines, number of DS1 lines, and the number of DS3 (or above) lines; and
  - (g) if the total number of voice grade equivalent lines assigned to each category in (f), using conventional conversion ratios of 24:1 for DS1 and 672:1 for DS3 is different from the number of equivalent lines provided in response to question (e) please explain the discrepancy.

**ANSWER:** Qwest does not own or operate any switches in the state of Tennessee.

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

2. State the total number of switching points of interface you have deployed in the State of Tennessee for the collection of traffic associated with local exchange service and identify the location of each such switching point of interface.

**ANSWER:** N/A - see answer to Question 1.

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

3. Do you currently provide local exchange service to end-user customers in TN with less than four voice grade (DS0) equivalents or lines? If the answer to this question is affirmative, state:

- (a) the total number of end user customers with less than four voice grade (DS0) lines or equivalents currently served;

**ANSWER:** Three Customers

- (b) the number of such access lines or equivalent lines that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA;

**ANSWER:** Zero

- (c) the number of such access lines or equivalent lines that you currently serve in Tennessee using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth; and

**ANSWER:** Qwest has 27 active lines; all of which are resold telecommunications services from BellSouth.

- (d) the number of such access lines or equivalent lines that you currently serve in the "density zone 1" central offices in the Nashville MSA using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.

**ANSWER:** Zero

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

4. Do you currently provide local exchange service to end-user customers in TN with more than four voice grade (DS0) equivalents or lines? If the answer to this question is affirmative, state:

- (a) the total number of end user customers with four or more voice grade lines (DS0) or equivalents currently served;

**ANSWER:** Zero

- (b) the total number of end-user customers with four or more voice grade (DS0) equivalents or lines currently served by you that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA;

**ANSWER:** Zero

- (c) the number of end-user customers with four or more voice grade (DS0) equivalents or lines currently served by you using: (i) facilities purchased exclusively from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.

**ANSWER:** Zero

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

5. Have you purchased switching from a telecommunications carrier other than BellSouth in providing local exchange service to end-user customers? If the answer to this question is affirmative, name the provider(s) of switching.

**ANSWER:** No.

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

6. If the response to question 5 (above) is negative, please:

- (a) state whether you have ever investigated or otherwise considered purchasing switching from a carrier other than BellSouth, and if so, the results of such investigation or consideration;

**ANSWER:** Qwest has not investigated purchasing switching from a carrier other than BellSouth.

- (b) state whether you have ever request switching from a carrier other than BellSouth, and, if so, the reason for such request and the reasons why you decided not to purchase switching from such carrier.

**ANSWER:** Qwest has not requested switching from a carrier other than BellSouth.

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

7. Identify carriers other than BellSouth, of which you are aware, that offer switching in Tennessee.

**ANSWER:** Qwest is not aware of any carriers other than BellSouth who offer switching in Tennessee.



*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

8. State all carriers that have purchased switching from you in Tennessee.

**ANSWER:** None.

*Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare  
Unbundled Switching An Unrestricted Unbundled Network Element*

Docket 02-00207

**Responses of Qwest Communications Corporation**

9. Identify all carriers that have made inquiries to you regarding the purchase of switching in Tennessee.

**ANSWER:** None.